

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BYTEMARK, INC.,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 2:16-cv-00543-JRG/RSP
	§	
MASABI LTD.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

**SECOND JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT
MASABI, LTD. TO RESPOND TO PLAINTIFF’S ORIGINAL COMPLAINT**

MASABI, LTD. (“Masabi”), Defendant in the above-entitled and numbered civil action, and BYTEMARK, INC., (“Bytemark”) Plaintiff in the above-entitled and numbered civil action, file this Second Joint Motion for Extension of Time for Defendant Masabi, Ltd. to Respond to Plaintiff’s Original Complaint and show:

1. Pursuant to the Court’s Order (Doc. No. 7) the current deadline for Masabi to respond to Plaintiff’s Original Complaint is August 29, 2016.
2. Masabi is a citizen of the United Kingdom and due to this fact requires an additional four (4) weeks, up to and including September 16, 2016, in which to respond to Plaintiff’s Original Complaint.
3. Consequently, Masabi and Bytemark jointly move the Court for an order granting an additional extension of time for Masabi to respond to Plaintiff’s Original Complaint, up to and including September 16, 2016. Grant of the requested additional extension will not unduly delay

the orderly and expeditious preparation of this action for trial and such request is not sought solely for purposes of delay but only so that justice may be done.

4. A proposed order granting the relief requested in this motion is attached.

WHEREFORE, Masabi and Bytemark jointly request the Court to extend Masabi's deadline to respond to Plaintiff's Original Complaint up to and including September 16, 2016 and for such other and further relief as the Court deems suitable and just.

Dated: August 11, 2016

Respectfully submitted,

A handwritten signature in blue ink that reads "Andy Tindel w/ permission of Lead Attorney". The signature is written in a cursive, flowing style.

Dariusz Keyhani, Lead Attorney
New Jersey State Bar No. 044062002
MEREDITH & KEYANI, PLLC
125 Park Avenue, 25th Floor
New York, NY 10017
(212) 760-0098 Telephone
(212) 202-3819 Facsimile
dkeyhani@meredithkeyhani.com

Andy Tindel
Texas State Bar No. 20054500
MT² LAW GROUP
MANN | TINDEL | THOMPSON
112 East Line Street, Suite 304
Tyler, Texas 75702
Telephone: (903) 596-0900
Facsimile: (903) 596-0909
Email: atindel@andytindel.com

Attorneys for Plaintiff Bytemark, Inc.

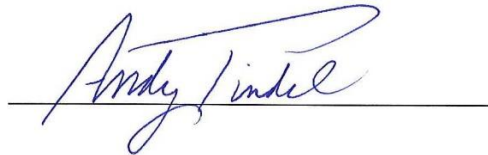
/s/ Douglas LaLone (w/permission AT)

Douglas P. LaLone
Fishman Stewart PLLC
39533 Woodward Avenue, Suite 140
Bloomfield Hills, MI 48304
Telephone: (248) 594-0650
Facsimile: (248) 594-0610
Email: DLaLone@fishstewip.com

Attorneys for Defendant Masabi Ltd.

CERTIFICATE OF SERVICE

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per E. Dist. Tex. Loc. Ct. R. CV-5(a)(3) on this the 11th of August, 2016. Any other known counsel of record will be served with a copy of this document by email and/or facsimile transmission

A handwritten signature in blue ink, reading "Andy Tindel", is written over a horizontal line.

Andy Tindel